

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IpLEARN, LLC,

Plaintiff,

v.

WBT SYSTEMS, LTD., *et al.*,

Defendants.

Civil Action No. 11-825-LPS

**DECLARATION OF FREDRICKA UNG IN SUPPORT OF IpLEARN, LLC'S
ANSWERING BRIEF IN OPPOSITION TO DEFENDANT ORACLE CORPORATION'S
MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT OR, IN THE
ALTERNATIVE, FOR A MORE DEFINITE STATEMENT**


I, Fredricka Ung, declare and state as follows:

1. I am a member of the State Bar of California and an associate at the firm of Russ, August & Kabat, counsel of record for Plaintiff IpLearn, LLC ("IpLearn") in the above-captioned action. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.
2. Attached hereto as Exhibit 1 is a true and correct copy of the July 21, 2004 letter sent from Peter Tong of IpLearn to Kevin J. Fitzgerald at Oracle Corporation ("Oracle") and the proof of delivery.
3. Attached hereto as Exhibit 2 is a true and correct copy of the August 20, 2004 letter sent from Peter Tong of IpLearn to Sanjay Prasad at Oracle and the proof of delivery.
4. Attached hereto as Exhibit 3 is a true and correct copy of this Court's Default Standard for Discovery.
5. Attached hereto as Exhibit 4 is a true and correct copy of a printout of Oracle's website, at <http://www.oracle.com/in/products/applications/peoplesoft-enterprise/index.html>.
6. Attached hereto as Exhibit 5 is a true and correct copy of a printout of Oracle's website, at <http://www.oracle.com/us/products/applications/036047.html>.

7. Attached hereto as Exhibit 6 is a true and correct copy of a printout of Oracle's website, at <http://www.oracle.com/us/products/middleware/bee hive/index.html>.

I declare under penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Executed this 9th day of January, 2012 at Los Angeles, California.

By: 
Fredricka Ung